

Section 1. Registration Information

Source Identification

| | |
|-------------------------|-----------------------------|
| Facility Name: | Delaware River Partners LLC |
| Parent Company #1 Name: | |
| Parent Company #2 Name: | |

Submission and Acceptance

| | |
|---|---|
| Submission Type: | Re-submission |
| Subsequent RMP Submission Reason: | Revised PHA / Hazard Review due to process change (40 CFR 68.190(b)(5)) |
| Description: | Gibbstown Facility: EPA Submission (with NO2) |
| Receipt Date: | 29-Oct-2021 |
| Postmark Date: | 29-Oct-2021 |
| Next Due Date: | 29-Oct-2026 |
| Completeness Check Date: | 29-Oct-2021 |
| Complete RMP: | Yes |
| De-Registration / Closed Reason: | |
| De-Registration / Closed Reason Other Text: | |
| De-Registered / Closed Date: | |
| De-Registered / Closed Effective Date: | |
| Certification Received: | Yes |

Facility Identification

| | |
|--------------------------------|----------------|
| EPA Facility Identifier: | 1000 0016 3093 |
| Other EPA Systems Facility ID: | 560309 |
| Facility Registry System ID: | |

Dun and Bradstreet Numbers (DUNS)

| | |
|-------------------------|-----------|
| Facility DUNS: | 933571957 |
| Parent Company #1 DUNS: | 80393730 |
| Parent Company #2 DUNS: | |

Facility Location Address

| | |
|-----------|-------------------|
| Street 1: | 200 N Repauno Ave |
| Street 2: | |
| City: | Gibbstown |
| State: | NEW JERSEY |
| ZIP: | 08027 |
| ZIP4: | 1096 |
| County: | GLOUCESTER |

Facility Latitude and Longitude

| | |
|----------------------------------|-------------------------------|
| Latitude (decimal): | 39.840868 |
| Longitude (decimal): | -075.302593 |
| Lat/Long Method: | Interpolation - Other |
| Lat/Long Description: | Other |
| Horizontal Accuracy Measure: | 15 |
| Horizontal Reference Datum Name: | World Geodetic System of 1984 |

Source Map Scale Number:

Owner or Operator

| | |
|-----------------|-----------------------------|
| Operator Name: | Delaware River Partners LLC |
| Operator Phone: | (856) 224-7000 |

Mailing Address

| | |
|-------------------------------------|-------------------|
| Operator Street 1: | 200 N Repauno Ave |
| Operator Street 2: | |
| Operator City: | Gibbstown |
| Operator State: | NEW JERSEY |
| Operator ZIP: | 08027 |
| Operator ZIP4: | 1096 |
| Operator Foreign State or Province: | |
| Operator Foreign ZIP: | |
| Operator Foreign Country: | |

Name and title of person or position responsible for Part 68 (RMP) Implementation

| | |
|----------------------------------|-----------------------------------|
| RMP Name of Person: | Jimmy Osman |
| RMP Title of Person or Position: | VP of Engineering and Development |
| RMP E-mail Address: | josman@repauno.com |

Emergency Contact

| | |
|-----------------------------------|-----------------------------------|
| Emergency Contact Name: | Jimmy Osman |
| Emergency Contact Title: | VP of Engineering and Development |
| Emergency Contact Phone: | (856) 224-7067 |
| Emergency Contact 24-Hour Phone: | (609) 970-3947 |
| Emergency Contact Ext. or PIN: | |
| Emergency Contact E-mail Address: | josman@repauno.com |

Other Points of Contact

| | |
|--|----------------------|
| Facility or Parent Company E-mail Address: | nmolloy@repauno.com |
| Facility Public Contact Phone: | (856) 224-7051 |
| Facility or Parent Company WWW Homepage Address: | 200 N Repauno Avenue |

Local Emergency Planning Committee

| | |
|-------|--------------------------------|
| LEPC: | Gibbstown Emergency Management |
|-------|--------------------------------|

Full Time Equivalent Employees

| | |
|--|----|
| Number of Full Time Employees (FTE) on Site: | 19 |
| FTE Claimed as CBI: | |

Covered By

| | |
|-------------|-----|
| OSHA PSM : | Yes |
| EPCRA 302 : | Yes |

CAA Title V:

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) 21-Jun-2021
Date:

Last Safety Inspection Performed By an External Agency: State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name: Nancy Molloy
Preparer Phone: (856) 224-7051
Preparer Street 1: 200 N Repauno Avenue
Preparer Street 2:
Preparer City: Gibbstown
Preparer State: NEW JERSEY
Preparer ZIP: 08027
Preparer ZIP4:
Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID: 1000120409
Description: LPG Transloading
Process Chemical ID: 1000150671
Program Level: Program Level 3 process
Chemical Name: Flammable Mixture
CAS Number: 00-11-11
Quantity (lbs): 49805280
CBI Claimed:
Flammable/Toxic: Flammable

Flammable Mixture Chemical Components

| | |
|--------------------------------|-------------------------------|
| Flammable Mixture Chemical ID: | 1000132505 |
| Chemical Name: | Butane |
| CAS Number: | 106-97-8 |
| Flammable/Toxic: | Flammable |
| Flammable Mixture Chemical ID: | 1000132506 |
| Chemical Name: | Isobutane [Propane, 2-methyl] |
| CAS Number: | 75-28-5 |
| Flammable/Toxic: | Flammable |
| Flammable Mixture Chemical ID: | 1000132507 |
| Chemical Name: | Propane |
| CAS Number: | 74-98-6 |
| Flammable/Toxic: | Flammable |

Process NAICS

| | |
|--------------------|---------------------------------------|
| Process ID: | 1000120409 |
| Process NAICS ID: | 1000121782 |
| Program Level: | Program Level 3 process |
| NAICS Code: | 42471 |
| NAICS Description: | Petroleum Bulk Stations and Terminals |

Section 2. Toxics: Worst Case

No records found.

Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000073840

Model Used:

EPA's RMP*Comp(TM)

Endpoint used:

1 PSI

Passive Mitigation Considered

Blast Walls:

Other Type:

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000069176

Model Used: EPA's RMP*Comp(TM)

Passive Mitigation Considered

- Dikes:
- Fire Walls:
- Blast Walls:
- Enclosures:
- Other Type:

Active Mitigation Considered

- Sprinkler System:
- Deluge System:
- Water Curtain:
- Excess Flow Valve:
- Other Type:

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

| | |
|---------------------------------|-------------------|
| Prevention Program Chemical ID: | 1000129757 |
| Chemical Name: | Flammable Mixture |
| Flammable/Toxic: | Flammable |
| CAS Number: | 00-11-11 |

| | |
|--------------------------------|------------------|
| Process ID: | 1000120409 |
| Description: | LPG Transloading |
| Prevention Program Level 3 ID: | 1000103358 |
| NAICS Code: | 42471 |

Safety Information

| | |
|---|-------------|
| Safety Review Date (The date on which the safety information was last reviewed or revised): | 01-Apr-2021 |
|---|-------------|

Process Hazard Analysis (PHA)

| | |
|---|-------------|
| PHA Completion Date (Date of last PHA or PHA update): | 07-Apr-2021 |
|---|-------------|

The Technique Used

| | |
|--|-------------|
| What If: | Yes |
| Checklist: | Yes |
| What If/Checklist: | |
| HAZOP: | Yes |
| Failure Mode and Effects Analysis: | |
| Fault Tree Analysis: | |
| Other Technique Used: | |
| PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update): | 01-May-2021 |

Major Hazards Identified

| | |
|--|-----|
| Toxic Release: | |
| Fire: | Yes |
| Explosion: | Yes |
| Runaway Reaction: | |
| Polymerization: | |
| Overpressurization: | Yes |
| Corrosion: | Yes |
| Overfilling: | Yes |
| Contamination: | Yes |
| Equipment Failure: | Yes |
| Loss of Cooling, Heating, Electricity, Instrument Air: | Yes |

| | |
|--------------------------------|-----|
| Earthquake: | |
| Floods (Flood Plain): | Yes |
| Tornado: | Yes |
| Hurricanes: | |
| Other Major Hazard Identified: | |

Process Controls in Use

| | |
|-------------------------------|-----|
| Vents: | Yes |
| Relief Valves: | Yes |
| Check Valves: | Yes |
| Scrubbers: | |
| Flares: | Yes |
| Manual Shutoffs: | Yes |
| Automatic Shutoffs: | Yes |
| Interlocks: | Yes |
| Alarms and Procedures: | Yes |
| Keyed Bypass: | |
| Emergency Air Supply: | |
| Emergency Power: | Yes |
| Backup Pump: | Yes |
| Grounding Equipment: | Yes |
| Inhibitor Addition: | |
| Rupture Disks: | |
| Excess Flow Device: | Yes |
| Quench System: | |
| Purge System: | Yes |
| None: | |
| Other Process Control in Use: | |

Mitigation Systems in Use

| | |
|---------------------------------|---------------------------------------|
| Sprinkler System: | Yes |
| Dikes: | |
| Fire Walls: | |
| Blast Walls: | |
| Deluge System: | Yes |
| Water Curtain: | |
| Enclosure: | |
| Neutralization: | |
| None: | |
| Other Mitigation System in Use: | Fire Water Exposure Protection System |

Monitoring/Detection Systems in Use

| | |
|---|--------------|
| Process Area Detectors: | Yes |
| Perimeter Monitors: | Yes |
| None: | |
| Other Monitoring/Detection System in Use: | LEL Monitors |

Changes Since Last PHA Update

| | |
|----------------------------------|-----|
| Reduction in Chemical Inventory: | |
| Increase in Chemical Inventory: | Yes |
| Change Process Parameters: | |

| | |
|---|-----|
| Installation of Process Controls: | Yes |
| Installation of Process Detection Systems: | Yes |
| Installation of Perimeter Monitoring Systems: | |
| Installation of Mitigation Systems: | Yes |
| None Recommended: | |
| None: | |
| Other Changes Since Last PHA or PHA Update: | |

Review of Operating Procedures

| | |
|--|-------------|
| Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): | 27-Sep-2021 |
|--|-------------|

Training

| | |
|---|-------------|
| Training Revision Date (The date of the most recent review or revision of training programs): | 27-Sep-2021 |
|---|-------------|

The Type of Training Provided

| | |
|-----------------|---|
| Classroom: | Yes |
| On the Job: | Yes |
| Other Training: | Safety training at Delaware Valley Safety Council |

The Type of Competency Testing Used

| | |
|--|-----|
| Written Tests: | Yes |
| Oral Tests: | |
| Demonstration: | Yes |
| Observation: | Yes |
| Other Type of Competency Testing Used: | |

Maintenance

| | |
|--|-------------|
| Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): | 01-May-2021 |
|--|-------------|

| | |
|---|-------------|
| Equipment Inspection Date (The date of the most recent equipment inspection or test): | 19-Oct-2021 |
|---|-------------|

| | |
|---|------------------------------|
| Equipment Tested (Equipment most recently inspected or tested): | Instrumentation and Controls |
|---|------------------------------|

Management of Change

| | |
|---|-------------|
| Change Management Date (The date of the most recent change that triggered management of change procedures): | 01-Apr-2021 |
|---|-------------|

| | |
|--|-------------|
| Change Management Revision Date (The date of the most recent review or revision of management of change procedures): | 20-Aug-2020 |
|--|-------------|

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review): 02-Jun-2021

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 21-Jun-2021

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 21-Jul-2021

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 15-Aug-2020

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 15-Aug-2020

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 13-Jan-2021

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 06-Apr-2021

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 04-Dec-2020

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 30-Dec-2020

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Gibbstown VFC

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (856) 423-6580

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify): NJAC 7:31 NJDEP TCPA Program; 29 CFR 1910.119 OSHA PSM, 40 CFR Part 68 EPA RMP

Executive Summary

Delaware River Partners LLC
Risk Management Program
Executive Summary

Delaware River Partners LLC (DRP) owns and operates the DRP Gibbstown Logistics Center in Gloucester County, New Jersey. The site was formerly owned by DuPont and operated as an explosives and chemical manufacturing facility from approximately 1890 to 1980. Chemours became the owner of record of the site in April 2015 and DRP acquired the site in June 2016. The site is being redeveloped into a multi-modal deep-water seaport by DRP. The site features an existing underground cavern that was previously mined out of metamorphic rock in approximately 1965. The cavern was previously used by DuPont for the storage of anhydrous ammonia.

Cavern storage and loading and unloading areas are located near the Delaware River, at the north of the site and about one mile from the site entrance. The cavern has been refurbished to receive, store, and distribute Liquefied Petroleum Gas (LPG). The cavern is located between 340 and 370 feet below the ground surface and has a storage capacity of approximately 7.8 million gallons (1 million cubic feet). The cavern and loading/unloading facilities were approved by the NJDEP for operation under the TCPA Risk Management Program, signed and dated 6/22/2017. A Major Modification to this approved RMP includes change of the covered chemical from Butane to Flammable Mixture, additional rail car rack, connection to the dock, truck transloading operations (landside) and the addition of a deep water port, constructed according to recommended industry specifications and operation under the jurisdiction of the USCG. These changes were covered under an major MOC and all subsequent process safety information, including a process hazard analysis (PHA), Inherently safer technology (IST) and pre start up Safety Review (PSSR) were performed. These changes were reviewed by the department during the last site inspection in May of 2021. One additional MOC recently completed included the addition of a chiller system and subsequent piping and control systems. This also met compliance by the completion of the PHA, IST, PSSR and updated process safety information.

LPG is a flammable substance and can be present as a liquid or a vapor (gas). The DRP transloading facility is designed in accordance with modern safety standards. The design, construction and operation includes all applicable codes and standards and industry best practices to prevent impact to human health and the environment.

1. The design of the transloading facility has been designed and constructed in accordance with current industry safety standards including:

- ¿ National Fire Protection Association (NFPA)
- ¿ International Code Council (ICC), which includes International Fire Code (IFC)
- ¿ American Petroleum Institute (API)
- ¿ American Society of Mechanical Engineers (ASME)

2. The transloading facility design includes redundant gas monitors, pressure relief valves, alarms and interlocks to protect the system and automatic emergency shut-down systems. In addition, an enclosed emergency flare system has been installed to collect and safely destroy flammable gas in case of an emergency.

3. The transloading system is subject to significant safety regulation, including construction approval and oversight by the New Jersey Department of Environmental Protection (DEP) Toxic Catastrophe Prevention Act (TCPA). The TCPA program incorporates (and is more stringent than) the USEPA Chemical Accident Prevention Provisions (40 CFR 68) and the OSHA Process Safety Management Standard (29 CFR 1910.119).

4. Transportation of LPG into and out of the site by truck or railcar is highly regulated by the US Department of Transportation (DOT). DRP is also a registered member of CHEMTREC, who is a leader in 24 hour Emergency Response and incident management.

5. DRP conducts annual emergency preparedness exercise with local and county emergency responders. The local volunteer department is supported by the Gloucester County Department of Emergency Response which includes 911 dispatch, fire and emergency medical services, and a hazardous materials response team.

6. In addition to the design, prevention, and emergency response elements discussed above, the safety management program for

the existing LPG Transloading Facility operation includes the following elements:

- ¿ Process Hazard Analysis (PHA) - A PHA has been conducted and documented for engineering design. An Inherently Safer Technology (IST) review and Layer of Protection Analysis (LOPA) has also been performed and documented.
- ¿ Process Safety Information - A Safety Review of Design Report has been prepared for the design and includes process safety information, process flow diagrams, Piping & Instrumentation Diagrams (P&IDs), and other details for the safe design, construction, and operation of the system.
- ¿ Standard Operating Procedures (SOPs) - SOPs have been developed based on the engineering design. The SOPs were updated and implemented prior to start-up of the system, and are reviewed and certified annually as accurate and complete by Operations.
- ¿ Hazard Review and Offsite Consequence Analysis - Worst-case and alternative case release scenarios were developed to assess the potential for offsite impact and support the PHA. There are no credible scenarios that have an offsite impact, and offsite receptors as defined in 40 CFR 68.30 and 68.33, are not present in the release distance to the endpoint.
- ¿ Pre-startup safety review (PSSR) - A PSSR was conducted in accordance with the TCEQ program requirements before startup of the cavern and is included in the tasks required prior to start up of the major modification to the registered RMP.
- ¿ Training and Employee Participation - Hazards have been communicated to all employees and contractors, and training has been conducted on the safe operation of the system. Employees and contractors actively participate in the annual facility emergency response drills. In addition, employees have been trained in the facility emergency action plan and included in the development of the PHA, SOPs, and other procedures.
- ¿ Contractor Safety - Contractors are pre-qualified and subjected to safety assessments.
- ¿ Maintenance and Mechanical Integrity - The cavern has undergone integrity and pressure testing, and the transloading system has been inspected for quality, specifications and performance during the PSSR prior to start up. Ongoing preventive maintenance and inspections are implemented to ensure ongoing safe operation and preventive maintenance of the facility assets.
- ¿ Safe Work Practices - Other procedures include Management of Change, Confined Space, Safe and Hot Work Permitting, and annual Compliance Audits.

The facility is also subject to site inspection annually or as requested by the NJDEP Bureau of release Prevention.

- ¿ Incident investigation - All incidents and accidents, including near-misses, will be investigated to improve safety and prevent re-occurrence. There have been no recordable incidents at DRP since construction and start up of the facility.